San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

DEC 23 2015

Mr. Erik Martella
CBUS OPS dba Mission Bell Winery
12667 Road 24
Madera, CA 93637

Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # C-628
Project # C-1152404

Dear Mr. Martella:

Enclosed for your review is the District's analysis of an application for Authority to Construct permits for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Permit units C-628-4, C-628-5 and C-628-13 will be modified to eliminate the option to use LPG as backup fuel; and the burner rating for permit unit C-628-13 will be corrected from 43.4 MMBtu/hr to 44 MMBtu/hr.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct permits with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct permits, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

for Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review

Boiler Modifications: Remove Backup Fuel Option & Correct Burner Rating

Facility Name:	CBUS OPS (dba Mission Bell Winery)	Date:	December 8, 2015
Mailing Address:	12667 Road 24 Madera, CA 93637	Engineer: Lead Engineer:	Jonah Aiyabei Joven Refuerzo
Contact Person:	Erik Martella		
Telephone:	(559) 661-5640		
Fax:	(559) 661-3427		
Application #(s):	C-628-4-10, 5-10 & 13-7		
Project #:	C-1152404		
Deemed Complete:	October 1, 2015		

I. PROPOSAL

Mission Bell Winery requests Authority to Construct (ATC) permits for modifications to the Permit to Operate (PTO) conditions for three boilers at their Madera winery. The permit conditions for all three boilers will be modified to remove the option to use LPG as backup fuel. After the proposed PTO modifications, the boilers will be fired exclusively on PUC natural gas. LPG storage tanks will be removed, but no physical modifications to the boilers themselves are required to implement the proposed operating changes.

The applicant also requests that the burner rating stated in the equipment description for permit unit C-628-13 be corrected from 43.4 MMBtu/hr to 44 MMBtu/hr.

In addition, the NOx emission factor for all three permit units will be corrected from 0.0088 lb/MMBtu to 0.008 lb/MMBtu. The emission factor of 0.008 lb/MMBtu/hr is consistent with the applicable compliance limit in District Rule 4320, and was correctly used in the emission calculations during the previous engineering evaluations. It appears that the current factor of 0.0088 lb/MMBtu listed on the PTOs is a typographical error. The following emission factor revisions will also be made for all three permit units, per District Policy APR 1110, Use of Revised Generally Accepted Emission Factors:

- The SOx emission factor for LPG combustion will be corrected from 0.017 lb/MMBtu to 0.016 lb/MMBtu. This emission factor is from AP-42 Table 1.5-1 (given in lb/1,000 gal) and the corrected conversion to lb/MMBtu is discussed in more detail in the in Section VII of this evaluation.

- The PM_{10} emission factor for LPG combustion will be corrected from 0.0044 lb/MMBtu to 0.0076 lb/MMBtu, pursuant to the most recent (2008) update to AP-42 Section 1.5.

The draft ATCs are included in Appendix A. ATC C-628-13-6 has not been implemented and will be deleted. Current PTOs C-628-4-8, 5-8 and 13-4 are included in Appendix B.

Mission Bell Winery received its Title V Permit in 2004. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the applicant has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. An application for an administrative amendment to the Title V permit will be required prior to implementation of the proposed changes.

II. APPLICABLE RULES

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4305	Boilers, Steam Generators and Process Heaters – Phase 2 (8/21/03)
Rule 4306	Boilers, Steam Generators and Process Heaters – Phase 3 (10/16/08)
Rule 4320	Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
Rule 4351	Boilers, Steam Generators and Process Heaters – Phase 1 (8/21/03)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

This facility is located at 12667 Road 24 in Madera. Since there is no increase in hazardous air emissions, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. PROCESS DESCRIPTION

Mission Bell Winery processes grapes to produce wine and associated beverages and products. The facility uses three natural gas-fired boilers to supply steam for its wine production operations.

V. EQUIPMENT LISTING

Pre-Project Equipment Descriptions:

C-628-4-8: 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (WEST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER

C-628-5-8: 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (EAST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER

C-628-13-4: 43.4 MMBTU/HR NEBRASKA MODEL NS-C-42-ECON NATURAL GAS-FIRED BOILER, EQUIPPED WITH AN ALZETA ULTRA-LOW NOX BURNER WITH A VARIABLE FREQUENCY DRIVE FOR AIR INTAKE FAN MOTOR AND OXYGEN TRIM EQUIPMENT IN EXHAUST STACK

Proposed Modification:

Remove LPG backup fuel option for all units and correct the rating for unit C-628-13 from 43.4 MMBtu/hr to 44 MMBtu/hr.

C-628-4-10: MODIFICATION OF 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (WEST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER: REMOVE LPG BACKUP FUEL OPTION

C-628-5-10: MODIFICATION OF 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (EAST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER: REMOVE LPG BACKUP FUEL OPTION

C-628-13-7: MODIFICATION OF 43.4 MMBTU/HR NEBRASKA MODEL NS-C-42-ECON NATURAL GAS-FIRED BOILER, EQUIPPED WITH AN ALZETA ULTRA-LOW NOX BURNER WITH A VARIABLE FREQUENCY DRIVE FOR AIR INTAKE FAN MOTOR AND OXYGEN TRIM EQUIPMENT IN EXHAUST STACK: REMOVE LPG BACKUP FUEL OPTION AND CORRECT BURNER RATING TO 44 MMBTU/HR

Post Project Equipment Description:

C-628-4-10: 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (WEST) WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER

C-628-5-10: 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (EAST) WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER

C-628-13-7: 44 MMBTU/HR NEBRASKA MODEL NS-C-42-ECON NATURAL GAS-FIRED BOILER, EQUIPPED WITH AN ALZETA ULTRA-LOW NOX BURNER WITH A

VARIABLE FREQUENCY DRIVE FOR AIR INTAKE FAN MOTOR AND OXYGEN TRIM EQUIPMENT IN EXHAUST STACK

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

The boilers are equipped with ultralow-NO_X burners capable of achieving NOx emissions of 7 ppmvd @ 3% O2, and are fired on PUC-quality natural gas.

Low-NO_X burners reduce NO_X formation by producing lower flame temperatures (and longer flames) than conventional burners. Conventional burners thoroughly mix all the fuel and air in a single stage just prior to combustion, whereas low-NO_X burners delay the mixing of fuel and air by introducing the fuel (or sometimes the air) in multiple stages. Generally, in the first combustion stage, the air-fuel mixture is fuel rich. In a fuel rich environment, all the oxygen will be consumed in reactions with the fuel, leaving no excess oxygen available to react with nitrogen to produce thermal NO_X. In the secondary and tertiary stages, the combustion zone is maintained in a fuel-lean environment. The excess air in these stages helps to reduce the flame temperature so that the reaction between the excess oxygen with nitrogen is minimized.

VII. GENERAL CALCULATIONS

A. Assumptions

- The maximum operating schedule is 24 hours per day
- Annual pre-project potential to emit is based on a maximum of 8,544 hours of natural gas and a maximum of 216 hours of LPG combustion per year
- Annual post-project potential to emit is based on a maximum of 8,760 hours of natural gas combustion per year
- Natural Gas Heating Value = 1,000 Btu/scf (District Practice)
- LPG Heating Value = 91,500 Btu/gal
- Maximum sulfur content of LPG is 15 gr/100 scf (District Practice)
- F-Factor for Natural Gas: 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B)
- To streamline emission calculations, PM2.5 emissions are assumed to be equal to PM10 emissions. Only if needed to determine if a project is a Federal major modification for PM2.5 will specific PM2.5 emission calculations be performed.
- Pursuant to the most recent (2008) update of AP-42 Section 1.5, PM, CO, and TOC emissions from LPG combustion are assumed to be the same, on a heat input basis, as for natural gas.

B. Emission Factors

The emissions factors currently applicable to all three units are as summarized in the following table:

Natural Gas Combustion Emission Factors			
Pollutant	**lb/MMBtu**	**ppmvd @ 3% O2**	**Source**
NO_X	0.008	7	Applicant
SO_X	0.00285	N/A	District Policy APR 1720
PM_{10}	0.0076	N/A	AP-42 Table 1.4-2 (07/98)
CO	0.074	100	Applicant
VOC	0.0055	N/A	AP-42 table 1.4-2 (07/98)

LPG Combustion Emission Factors			
Pollutant	**lb/MMBtu**	**ppmvd @ 3% O2**	**Source**
NO_X	0.008	7	Applicant
SO_X	0.016	N/A	AP-42 Table 1.5-1 (7/08)*
PM_{10}	0.0076	N/A	AP-42 Table 1.5-1
CO	0.148	200	Applicant
VOC	0.0055	N/A	AP-42 Table 1.5-1 (7/08)

*LPG Combustion SO_x Emission Factor Calculation:

SOx EF = 0.1(S)/1,000 gal, where S = sulfur content in gr/100 scf
= (0.1 x 15) lb/1,000 gal = 1.5 lb/1,000 gal
= 1.5 lb/1,000 gal x (1 gal/0.0915 MMBtu)
= 0.0164 lb-SO_x/MMBtu

C. Calculations

1. Pre-Project Potential to Emit (PE1)

The PE1 for each pollutant is calculated as follows:

PE1 = EF (lb/MMBtu) × Heat Input (MMBtu/hr) × Op. Sched. (hrs/day or hrs/year)

The PE1 calculations are as summarized in the following tables:

C-628-4-8 & 5-8: Daily PE1 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/day)**	**PE1 (lb/day)**
NO_X	0.008	97	24	18.6
SO_X	0.00285	97	24	6.6
PM_{10}	0.0076	97	24	17.7
CO	0.074	97	24	172.3
VOC	0.0055	97	24	12.8

C-628-4-8 & 5-8: Daily PE1 – LPG				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/day)**	**PE1 (lb/day)**
NO_X	0.008	97	24	18.6
SO_X	0.016	97	24	37.2
PM_{10}	0.0076	97	24	17.7
CO	0.148	97	24	344.5
VOC	0.0055	97	24	12.8

C-628-13-4: Daily PE1 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/day)**	**PE1 (lb/day)**
NO_X	0.008	44	24	8.4
SO_X	0.00285	44	24	3.0
PM_{10}	0.0076	44	24	8.0
CO	0.074	44	24	78.1
VOC	0.0055	44	24	5.8

C-628-13-4: Daily PE1 – LPG				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/day)**	**PE1 (lb/day)**
NO_X	0.008	44	24	8.4
SO_X	0.016	44	24	16.9
PM_{10}	0.0076	44	24	8.0
CO	0.148	44	24	156.3
VOC	0.0055	44	24	5.8

C-628-4-8 & 5-8: Annual PE1 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/yr)**	**PE1 (lb/yr)**
NO_X	0.008	97	8,544	6,630
SO_X	0.00285	97	8,544	2,362
PM_{10}	0.0076	97	8,544	6,299
CO	0.074	97	8,544	61,329
VOC	0.0055	97	8,544	4,558

C-628-4-8 & 5-8: Annual PE1 – LPG				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/yr)**	**PE1 (lb/yr)**
NO_X	0.008	97	216	168
SO_X	0.016	97	216	335
PM_{10}	0.0076	97	216	159
CO	0.148	97	216	3,101
VOC	0.0055	97	216	115

C-628-4-8 & 5-8: Annual PE1 – Total			
Pollutant	**Natural Gas PE (lb/yr)**	**LPG PE (lb/yr)**	**Total PE (lb/yr)**
NO_X	6,630	168	6,798
SO_X	2,362	335	2,697
PM_{10}	6,299	159	6,458
CO	61,329	3,101	64,430
VOC	4,558	115	4,673

C-628-13-4: Annual PE1 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/yr)**	**PE1 (lb/yr)**
NO_X	0.008	44	8,544	3,007
SO_X	0.00285	44	8,544	1,071
PM_{10}	0.0076	44	8,544	2,857
CO	0.074	44	8,544	27,819
VOC	0.0055	44	8,544	2,068

C-628-13-4: Annual PE1 – LPG				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/yr)**	**PE1 (lb/yr)**
NO_X	0.008	44	216	76
SO_X	0.016	44	216	152
PM_{10}	0.0076	44	216	72
CO	0.148	44	216	1,407
VOC	0.0055	44	216	52

C-628-13-4: Annual PE1 – Total			
Pollutant	**Natural Gas PE (lb/yr)**	**LPG PE (lb/yr)**	**Total PE (lb/yr)**
NO_X	3,007	76	3,083
SO_X	1,071	152	1,223
PM_{10}	2,857	72	2,929
CO	27,819	1,407	29,226
VOC	2,068	52	2,120

2. Post Project Potential to Emit (PE2)

The PE2 for each pollutant is calculated as follows:

PE2 = EF (lb/MMBtu) × Heat Input (MMBtu/hr) × Op. Sched. (hrs/day or hrs/year)

The PE2 calculations are as summarized in the following tables:

C-628-4-10 & 5-10: Daily PE2 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/day)**	**PE2 (lb/day)**
NO_X	0.008	97	24	18.6
SO_X	0.00285	97	24	6.6
PM_{10}	0.0076	97	24	17.7
CO	0.074	97	24	172.3
VOC	0.0055	97	24	12.8

C-628-13-7: Daily PE2 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/day)**	**PE2 (lb/day)**
NO_X	0.008	44	24	8.4
SO_X	0.00285	44	24	3.0
PM_{10}	0.0076	44	24	8.0
CO	0.074	44	24	78.1
VOC	0.0055	44	24	5.8

C-628-4-10 & 5-10: Annual PE2 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/yr)**	**PE2 (lb/yr)**
NO_X	0.008	97	8,760	6,798
SO_X	0.00285	97	8,760	2,422
PM_{10}	0.0076	97	8,760	6,458
CO	0.074	97	8,760	62,879
VOC	0.0055	97	8,760	4,673

C-628-13-7: Annual PE2 – Natural Gas				
Pollutant	**EF (lb/MMBtu)**	**Heat Input (MMBtu/hr)**	**Operation Schedule (hrs/yr)**	**PE2 (lb/yr)**
NO_X	0.008	44	8,760	3,083
SO_X	0.00285	44	8,760	1,099
PM_{10}	0.0076	44	8,760	2,929
CO	0.074	44	8,760	28,523
VOC	0.0055	44	8,760	2,120

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

The SSPE1 for this facility is as summarized in the following table:

SSPE1 (lb/yr)					
Permit Unit	**NO_x**	**SOx**	**PM10**	**CO**	**VOC**
C-628-3-7	3,139	511	657	38,106	10,877
C-628-4-8	6,798	2,697	6,458	64,430	4,673
C-628-5-8	6,798	2,697	6,458	64,430	4,673
C-628-6-2	1,148	77	44	248	109
C-628-12-1	0	0	206	0	0
C-628-13-4	3,083	1,223	2,929	29,226	2,120
C-628-15-0 through C-628-435-0, and '-476-0 through '-478-0	0	0	0	0	103,665
C-628-749-1	11	0	5	82	1
C-628-751-0	0	0	0	0	24
C-628-752-1	183	20	28	187	52
SSPE1	**21,160**	**7,225**	**16,785**	**196,709**	**126,194**

4. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

The SSPE2 for this facility is as summarized in the following table:

SSPE2 (lb/yr)					
Permit Unit	**NO_x**	**SOx**	**PM10**	**CO**	**VOC**
C-628-3-7	3,139	511	657	38,106	10,877
C-628-4-10	6,798	2,422	6,458	62,879	4,673
C-628-5-10	6,798	2,422	6,458	62,879	4,673
C-628-6-2	1,148	77	44	248	109
C-628-12-1	0	0	206	0	0
C-628-13-7	3,083	1,099	2,929	28,523	2,120
C-628-15-0 through C-628-435-0, and '-476-0 through '-478-0	0	0	0	0	103,665
C-628-749-1	11	0	5	82	1
C-628-751-0	0	0	0	0	24
C-628-752-1	183	20	28	187	52
SSPE2	**21,160**	**6,551**	**16,785**	**192,904**	**126,194**

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)						
	NO_X	SO_X	PM_{10}	$PM_{2.5}$	CO	VOC
SSPE1	21,160	7,225	16,785	16,785	196,709	126,194
SSPE2	21,160	6,551	16,785	16,785	192,904	126,194
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source?	Yes	No	No	No	No	Yes

Note: PM2.5 assumed to be equal to PM10

As shown in the table above, the facility is an existing major source for NOx and VOC emissions and will remain a major source for NOx and VOC emissions. No changes in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Estimated Facility PE before Project Increase	10.6	63.1	3.6	98.4	8.3	8.4
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown in the preceding table, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

SOx, PM10 and CO

Since the facility is not a major source for SOx, PM10 or CO, BE = PE1 for these pollutants.

NOx and VOC

Clean Emissions Units, Located at a Major Source

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

The boilers are all equipped with ultra low NOx burners, which meet the requirements for achieved-in-practice BACT for NOx emissions. The boilers are also fired on natural gas, which meets the requirements for achieved-in-practice BACT for VOC emissions. The units are therefore considered Clean Emissions Units, and BE = PE1.

7. Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is a major source for NOx and VOC, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required:

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NOx	16,679	50,000	no
VOC	11,466	50,000	no

Since the SB 288 Major Modification thresholds are not surpassed, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

For existing emissions units, the increase in emissions is calculated as follows:

Emission Increase = PAE – BAE – UBC

Where: PAE = Projected Actual Emissions, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

UBC: Since this project does not result in an increase in design capacity or potential to emit, and it does not impact the ability of the emission unit to operate at a higher utilization rate, the UBC is the portion of PAE that the emission units could have accommodated during the baseline period.

Since the proposed modifications do not result in any increases in design capacities or potentials to emit, and they do not impact the ability of the emission units to operate at higher utilization rates (and there are no existing physical or legal limitations on the units' ability to operate at higher utilization rates), the emission increases are presumed to be 0, and hence no detailed calculations are required.
The project's combined total emission increases are compared to the Federal Major Modification Thresholds in the following table:

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NOx*	0	0	No
VOC*	0	0	No

*If there is any emission increases in NO_x or VOC, this project is a Federal Major Modification and no further analysis is required.

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	8.3	5.7	3.0	77.1	7.9	7.9
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix C.

VIII. COMPLIANCE

District Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

AIPE = PE2 – HAPE

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)
PE2 = Post-Project Potential to Emit, (lb/day)
HAPE = Historically Adjusted Potential to Emit, (lb/day)

HAPE = PE1 x (EF2/EF1)

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)
EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

AIPE = PE2 – (PE1 x (EF2 / EF1))

Natural Gas Combustion:

As discussed in Section I, the three units will be fired exclusively on natural gas after this modification. As discussed in Section VII, for each unit, PE2 = PE1 and EF2 = EF1 for all pollutants. Thus, for each unit, AIPE = PE2 – PE1 = 0 lb/day for all pollutants.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification for NO_X emissions. Therefore BACT is not triggered for any pollutant.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table:

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	21,160	6,551	16,785	192,904	126,194
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	No	No	Yes

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for NOx and VOC and the SSPE2 is greater than the offset thresholds. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NOx and VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = HAE

As determined in Section VII.C.6 above, BE = PE1 since the units are Clean Emissions Units.

Also, there are no increases in cargo carrier emissions. Therefore offsets can be determined as follows for each unit:

Offsets Required (lb/year) = ([PE2 – BE] + ICCE) x DOR

Since PE2 = PE1, Offsets Required (lb/year) = ([PE2 – PE2] + 0) x DOR
= 0 lb /year

As demonstrated in the calculation above, the quantity of offsets required is zero. Therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed, and/or
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.
e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table:

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO_X	21,160	21,160	20,000 lb/year	No
SO_X	7,225	6,551	54,750 lb/year	No
PM_{10}	16,785	16,785	29,200 lb/year	No
CO	196,709	192,904	200,000 lb/year	No
VOC	126,194	126,194	20,000 lb/year	No

As demonstrated above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO_X	21,160	21,160	0	20,000 lb/year	No
SO_X	6,551	7,225	-674	20,000 lb/year	No
PM_{10}	16,785	16,785	0	20,000 lb/year	No
CO	192,904	196,709	-3,805	20,000 lb/year	No
VOC	126,194	126,194	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project does not constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is not required.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

The DELs for these units is based on the use of natural gas fuel and will be stated in the form of emission factors as shown below:

Proposed Rule 2201 (DEL) Conditions:

- This unit shall be fired exclusively on PUC-regulated natural gas. [District Rules 2201 and 4320, 5.4.1.1] Y

- Emissions rates from this unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Y

E. Compliance Assurance

1. Source Testing

These units are subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3, and District Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr.* Source testing requirements, in accordance with District Rules 4305, 4306, and 4320 will be discussed under the District Rule 4320 section.

2. Monitoring

As required by *District Rule 4305, Boilers, Steam Generators and Process Heaters, Phase 2, District Rule 4306, Boilers, Steam Generators and Process Heaters, Phase 3, and District Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr*, these units are subject to monitoring requirements. Monitoring requirements, in accordance with District Rules 4305, 4306, and 4320 will be discussed under the District Rule 4320 section.

3. Recordkeeping

As required by *District Rule 4305, Boilers, Steam Generators and Process Heaters, Phase 2, District Rule 4306, Boilers, Steam Generators and Process Heaters, Phase 3, and District Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr*, these units are subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rules 4305, 4306, and 4320 will be discussed under the District Rule 4320 section.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

District Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
   a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and

b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment prior to operating with the proposed modifications. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application. Continued compliance with this rule is expected.

District Rule 4001 New Source Performance Standards

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. 40 CFR Part 60, Subpart Dc applies to Small Industrial-Commercial-Industrial Steam Generators between 10 MMBtu/hr and 100 MMBtu/hr (post-6/9/89 construction, modification or, reconstruction). Subpart Dc has standards for SO_X and PM_{10}. Since the three boilers are rated between 10 MMBtu/hr and 100 MMBtu/hr and were constructed after 1989, they are subject to Subpart Dc requirements.

§60.332 Standard for Sulfur Dioxide:

Since coal is not combusted by the boilers in this project, the requirements of this section are not applicable.

§ 60.43c Standards for Particulate Matter

The boilers are not fired on coal, combust mixtures of coal with other fuels, combust wood, combust mixtured of wood with other fuels, or oil; therefore they will not be subject to the requirements of this section.

§60.44c Compliance and Performance Tests Methods and Procedures for Sulfur Dioxide.

Since the boilers in this project are not subject to the sulfur dioxide requirements of this subpart, no testing to show compliance is required. Therefore, the requirements of this section are not applicable to the boilers in this project.

§60.45c Compliance and Performance Test Methods and Procedures for Particulate Matter

Since the boilers in this project are not subject to the particulae matter requirements of this subpart, no testing to show compliance is required. Therefore, the requirements of this section are not applicable to the boilers in this project.

§60.46c Emission Monitoring for Sulfur Dioxide

Since the boilers in this project are not subject to the sulfur dioxide requirements of this subpart, no monitoring is required. Therefore, the requirements of this section are not

applicable to the boilers in this project.

§60.47c Emission Monitoring for Particulate Matter

Since the boilers in this project are not subject to the particulate matter requirements of this subpart, no monitoring is required. Therefore, the requirements of this section are not applicable to the boilers in this project.

§60.48c Reporting and Recordingkeeping Requirements

Section 60.48c(a) states that the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

The design heat input capacity and type of fuel combusted at the facility will be listed on each unit's equipment description. No conditions are required to show compliance with this requirement.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel mixture of fuels under §60.42c or §40.43c.

This requirement is not applicable since the units are not subject to §60.42c or §40.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

The facility has not proposed an annual capacity factor; therefore one will not be required.

(4) Notification if an emerging technology will be used for controlling SO2 emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator

This requirement is not applicable since the unit will not be equipped with an emerging technology used to control SO2 emissions.

Section 60.48 c (g) states that the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. Or, as an alternative, owners of an affected facility that combusts only natural gas, wood, fuels using fuel certification in Section 60.48c(f) to demonstrate compliance with the SO2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to

record and maintain records of the amount of each fuel combusted during each calendar month. Compliance is assured with the following condition:

- Permittee shall record the monthly fuel consumption. [District Rule 1070 and 2520, 9.3.2, and 40 CFR 60.48(c)(g)(2)] Y

Section 60.48 c (i) states that all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. District Rule 4320 is more stringent and requires that records be kept for five years. Compliance is assured with the following condition:

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Y

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

The requirements of 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters) are applicable to boilers located at major HAP sources (as defined in 40 CFR 63.2 – Definitions).

Based on data in the most recent emissions inventory statement, this facility is not a major HAP source; hence the requirements of this subpart do not apply.

District Rule 4101 Visible Emissions

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringlemann 1 or equivalent to 20% opacity.

A permit condition will be listed on the permit as follows:

- {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Therefore, compliance with District Rule 4101 requirements is expected.

District Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

A permit condition will be listed on the permit as follows:

- {98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

District Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

F-Factor for NG: 8,578 dscf/MMBtu at 60 °F

PM10 Emission Factor: 0.0076 lb-PM10/MMBtu

Percentage of PM as PM10 in Exhaust: 100%

Exhaust Oxygen (O_2) Concentration: 3%

Excess Air Correction to F Factor = $\frac{20.9}{(20.9 - 3)} = 1.17$

$$GL = \left(\frac{0.0076\ lb - PM}{MMBtu} \times \frac{7{,}000\ grain}{lb - PM} \right) / \left(\frac{8{,}578\ ft^3}{MMBtu} \times 1.17 \right)$$

$$GL = 0.0053\ grain/dscf < 0.1\ grain/dscf$$

Therefore, compliance with District Rule 4201 requirements is expected and a permit condition will be listed on the permit as follows:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

District Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO_2, NO_2, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter.

District Rule 4301 Limits			
Pollutant	**NO_2**	**Total PM**	**SO_2**
ATC C-628-4-10 (lb/hr)	0.78	0.74	0.28
ATC C-628-5-10 (lb/hr)	0.78	0.74	0.28
ATC C-628-13-7 (lb/hr)	0.35	0.33	0.13
Rule Limit (lb/hr)	140	10	200

The above table indicates compliance with the maximum lb/hr emissions in this rule; therefore, continued compliance is expected.

District Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2

The boilers are subject to Rule 4305, *Boilers, Steam Generators and Process Heaters – Phase 2.* In addition, the boilers are also subject to District Rule 4320. Since emissions limits of Rule 4320 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4305.

Therefore, compliance with District Rule 4305 requirements is expected and no further discussion is required.

District Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3

The boilers are subject to District Rule 4306, *Boilers, Steam Generators and Process Heaters – Phase 3.* In addition, the boilers are also subject to District Rule 4320. Since emissions limits of District Rule 4320 and all other requirements are equivalent or more stringent than District Rule 4306 requirements, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4306.

Therefore, compliance with District Rule 4306 requirements is expected and no further discussion is required.

Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr

This rule limits NOx, CO, SO_2, and PM_{10} emissions from boilers, steam generators and process heaters rated greater than 5 MMBtu/hr. This rule also provides a compliance option of payment of fees in proportion to the actual amount of NOx emitted over the previous year.

Section 5.2.1 states that on and after the indicated Compliance Deadline, units shall not be operated in a manner which exceeds the applicable NOx limit specified in Table 1 of this rule. Additionally, on and after October 1, 2008, units shall not be operated in a manner to which exceeds a carbon monoxide (CO) emissions limit of 400 ppmv.

The boilers at this facility fall under Category B shown in the following table:

Rule 4320 NOx Emission Limits			
	NOx Limit	**Authority to Construct**	**Compliance Deadline**
B. Units with a total rated heat input > 20.0 MMBtu/hr, except for Categories C through G	a) Standard Schedule 7 ppmv or 0.008 lb/MMBtu ; or	July 1, 2009	July 1, 2010
	b) Enhanced Schedule 5 ppmv or 0.0062 lb/MMBtu	January 1, 2013	January 1, 2014

As previously discussed, for all three boilers, the NO_x emission factor is 7 ppmvd @ 3% O_2 (0.008 lb/MMBtu), and the CO emission factor is 100 ppmvd @ 3% O_2 (0.074 lb/MMBtu).

Therefore, compliance with Section 5.2 of District Rule 4320 is expected. The following condition will be listed on the permits:

- Emissions rates from this unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Y.

Section 5.4 lists the control requirements for particulate matter. Section 5.4.1 states that to limit particulate matter emissions, an operator shall comply with one of the following requirements:

5.4.1.1 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall fire units exclusively on PUC-quality natural gas, commercial propane, butane, or liquefied petroleum gas, or a combination of such gases;

5.4.1.2 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall limit fuel sulfur content to no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet; or

5.4.1.3 On and after the applicable NOx Compliance Deadline specified in Section 5.2 Table 1, operators shall install and properly operate an emission control system that reduces SO2 emissions by at least 95% by weight, or limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% O2.

5.4.1.4 Notwithstanding the compliance deadlines indicated in Sections 5.4.1.1 through 5.4.1.3, refinery units, which require modification of refinery equipment to reduce sulfur emissions, shall be in compliance with the applicable requirement in Section 5.4.1 no later than July 1, 2013.

The boilers will be fired exclusively on PUC natural gas and therefore meet the requirement of Section 5.4.1.1 listed above. The following condition will be listed on the permits:

- This unit shall be fired exclusively on PUC-regulated natural gas. [District Rules 2201 and 4320, 5.4.1.1] Y

Section 5.7.1 requires that permit units subject to the emission limits specified in Section 5.2 shall either install and maintain an operational APCO approved Continuous Emission Monitoring System (CEMS) for NO_X, CO and O_2, or implement an APCO-approved alternate monitoring.

The boilers are subject to pre-approved alternate monitoring scheme A (pursuant to District Policy SSP-1105), which requires that monitoring of NO_x, CO, and O_2 exhaust concentrations shall be conducted at least once per month (in which a source test is not performed) using a portable analyzer. The following conditions will be listed on the permits:

- The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Y

- If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Y

- All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Y

- The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO

concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Y

Section 5.7.6 outlines requirements for monitoring SO_x emissions. Section 5.7.6.1 requires the operator of any unit that proposes to comply with Section 5.4.1.1 (fire exclusively on PUC-quality natural gas, commercial propane, butane, LPG, or a combination of these fuel gases) or Section 5.4.1.2 (fuel sulfur content limit of 5 grains/100 scf) to provide an annual fuel analysis.

The boilers comply with Section 5.4.1.1, therefore the facility will be required to submit fuel analysis reports. The following condition will be listed on the permits:

- The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Y

Section 5.8.1 states that the operator of any unit shall have the option of complying with either the applicable heat input, in lb/MMBtu, emission limits or the concentration, in ppmv, emission limits specified in Section 5.2. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).

Section 5.8.2 states that all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0.

The following conditions will be listed on the permits:

- The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Y

- All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Y

Section 5.8.4 states that for emissions monitoring pursuant to Sections 5.7.1 and 6.3.1 using a portable NO_X analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five readings evenly spaced out over the 15-consecutive-minute period.

The following conditions will be listed on the permits:

- All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Y

Section 5.8.5 states that for emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation of this rule, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit.

The following condition will be listed on the permits:

- For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Y

Section 6.1 states that the records required by Sections 6.1.1 through 6.1.5 shall be maintained for five calendar years and shall be made available to the APCO and EPA upon request. Failure to maintain records or information contained in the records that demonstrate noncompliance with the applicable requirements of this rule shall constitute a violation of this rule.

The following condition will be listed on the permits:

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Y

Section 6.1.3 states that the operator of any unit subject to Section 5.5.1 or Section 6.3.1 shall maintain records to verify that the required tune-up and the required monitoring of the operational characteristics of the unit have been performed. The boilers are subject to the monitoring requirements of Section 6.3.1.

The following condition will be listed on the permits:

- The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action

taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Y

Section 6.2 identifies the following test methods as District-approved source testing methods for the pollutants listed:

Pollutant	Units	Test Method Required
NO_X	ppmv	EPA Method 7E or ARB Method 100
NO_X	lb/MMBtu	EPA Method 19
CO	ppmv	EPA Method 10 or ARB Method 100
SO_X	ppmv	EPA Method 6C, EPA Method 8, or ARB Method 100
Stack Gas O_2	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

Section 6.2.1 states that fuel hhv shall be certified by third party fuel supplier or determined by ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels; ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels.

The following conditions will be listed on the permits:

- NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Y
- CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Y
- Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Y
- Fuel hhv for source test purposes shall be certified by a third party fuel supplier or determined using ASTM D 1826 or D1945 in conjunction with ASTM D 3588 for gaseous fuels or ASTM D 240 or D 2382 for liquid hydrocarbon fuels. [District Rules 4305, 4306, and 4320] Y

Section 6.3.1 requires that units be tested to determine compliance with the applicable requirements of Section 5.2 not less than once every 12 months. Upon demonstrating compliance on two consecutive compliance source tests, the following source test may be deferred for up to 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits specified in Section 5.2, the source testing frequency shall revert to at least once every 12 months.

The following conditions will be listed on the permits:

- Source testing to measure NOx and CO emissions from this unit shall be conducted at

least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Y

As discussed above, conditions will be incorporated into the permit in order to ensure compliance with each section of this rule. Compliance with the rule requirements is therefore expected.

District Rule 4351 Boilers, Steam Generators and Process Heaters – Phase 1

This rule applies to boilers, steam generators, and process heaters at NO_x Major Sources that are not located west of Interstate 5 in Fresno, Kings, or Kern counties. If applicable, the emission limits, monitoring provisions, and testing requirements of this rule are satisfied when the unit is operated in compliance with Rule 4320. Therefore, compliance with this rule is expected.

District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

Compliance with the requirements of Rule 4320 ensures that the much higher emission limits of Rule 4801 will be met. Continued compliance is expected.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) do not trigger Best Available Control Technology (BACT) and do not trigger Toxic Best Available Control Technology (T-BACT) requirements.

Issuance of permits for emissions units not subject to BACT or T-BACT requirements is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Issue Authorities to Construct C-628-4-10, 5-10 & 13-7 subject to the permit conditions on the draft Authorities to Construct in Appendix A.

X. BILLING INFORMATION

Annual Permit Fees			
Permit Number	**Fee Schedule**	**Fee Description**	**Annual Fee**
C-628-4-10	3020-02- H	97 MMBtu/hr	$ 1,080
C-628-5-10	3020-02- H	97 MMBtu/hr	$ 1,080
C-628-13-7	3020-02- H	44 MMBtu/hr	$ 1,080

APPENDICES

A: Draft ATCs
B: Current PTOs
C: Quarterly Net Emissions Change
D: Emission Profiles
E: Compliance Certification

APPENDIX A

Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-628-4-10

ISSUANCE DATE: DRAFT

DRAFT

LEGAL OWNER OR OPERATOR: CBUS OPS DBA MISSION BELL WINERY
MAILING ADDRESS: 12667 ROAD 24
MADERA, CA 93637

LOCATION: 12667 ROAD 24
MADERA, CA 93637

EQUIPMENT DESCRIPTION:
MODIFICATION OF 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (WEST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER: REMOVE LPG BACKUP FUEL OPTION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. This unit shall be fired exclusively on PUC-regulated natural gas. [District Rules 2201 and 4320, 5.4.1.1] Federally Enforceable Through Title V Permit
6. Emissions rates from this unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services
C-628-4-10 : Dec 9 2015 8:12AM -- AIYABEIJ : Joint Inspection NOT Required

7. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

8. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

9. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

12. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

13. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Fuel hhv for source test purposes shall be certified by a third party fuel supplier or determined using ASTM D 1826 or D1945 in conjunction with ASTM D 3588 for gaseous fuels or ASTM D 240 or D 2382 for liquid hydrocarbon fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

18. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

19. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

21. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

23. Permittee shall record the monthly fuel consumption. [District Rule 1070 and 2520, 9.3.2, and 40 CFR 60.48(c)(g)(2)] Federally Enforceable Through Title V Permit

24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-628-5-10

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: CBUS OPS DBA MISSION BELL WINERY
MAILING ADDRESS: 12667 ROAD 24
MADERA, CA 93637

LOCATION: 12667 ROAD 24
MADERA, CA 93637

EQUIPMENT DESCRIPTION:
MODIFICATION OF 97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (EAST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER: REMOVE LPG BACKUP FUEL OPTION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. This unit shall be fired exclusively on PUC-regulated natural gas. [District Rules 2201 and 4320, 5.4.1.1] Federally Enforceable Through Title V Permit
6. Emissions rates from this unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
C-628-5-10 : Dec 9 2015 8:12AM -- AFYABEIJ : Joint Inspection NOT Required

7. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

8. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

9. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

12. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

13. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Fuel hhv for source test purposes shall be certified by a third party fuel supplier or determined using ASTM D 1826 or D1945 in conjunction with ASTM D 3588 for gaseous fuels or ASTM D 240 or D 2382 for liquid hydrocarbon fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

18. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

19. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

21. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

23. Permittee shall record the monthly fuel consumption. [District Rule 1070 and 2520, 9.3.2, and 40 CFR 60.48(c)(g)(2)] Federally Enforceable Through Title V Permit

24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-628-13-7

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: CBUS OPS DBA MISSION BELL WINERY
MAILING ADDRESS: 12667 ROAD 24
MADERA, CA 93637

LOCATION: 12667 ROAD 24
MADERA, CA 93637

EQUIPMENT DESCRIPTION:
MODIFICATION OF 43.4 MMBTU/HR NEBRASKA MODEL NS-C-42-ECON NATURAL GAS-FIRED BOILER, EQUIPPED WITH AN ALZETA ULTRA-LOW NOX BURNER WITH A VARIABLE FREQUENCY DRIVE FOR AIR INTAKE FAN MOTOR AND OXYGEN TRIM EQUIPMENT IN EXHAUST STACK: REMOVE LPG BACKUP OPTION AND CORRECT BURNER RATING TO 44 MMBTU/HR

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. This unit shall be fired exclusively on PUC-regulated natural gas. [District Rules 2201 and 4320, 5.4.1.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
C-628-13-7 : Dec 9 2015 8:12AM – AIYABEIJ : Joint Inspection NOT Required

6. Emissions rates from this unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Federally Enforceable Through Title V Permit

7. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

8. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

9. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

12. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

13. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

14. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

15. Fuel hhv for source test purposes shall be certified by a third party fuel supplier or determined using ASTM D 1826 or D1945 in conjunction with ASTM D 3588 for gaseous fuels or ASTM D 240 or D 2382 for liquid hydrocarbon fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

17. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

18. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

21. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

22. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

23. Permittee shall record the monthly fuel consumption. [District Rule 1070 and 2520, 9.3.2, and 40 CFR 60.48(c)(g)(2)] Federally Enforceable Through Title V Permit

24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Federally Enforceable Through Title V Permit

APPENDIX B

Current PTOs

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-628-4-8 **EXPIRATION DATE:** 11/30/2016

EQUIPMENT DESCRIPTION:
97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (WEST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas as the primary fuel and LPG as the backup fuel. [District Rules 2201 and 4320, 5.4.1.1] Federally Enforceable Through Title V Permit
4. The sulfur content of the LPG backup fuel shall not exceed 15 grain per 100 scf. [District Rules 2201 and 4320, 5.4.2] Federally Enforceable Through Title V Permit
5. When fired on natural gas, emissions rates from the unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0088 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Federally Enforceable Through Title V Permit
6. When fired on LPG as backup fuel, emissions rates from the unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0088 lb-NOx/MMBtu, 0.0044 lb-PM10/MMBtu, 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu, or 0.017 lb-SOx/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1 and 4320, 5.2] Federally Enforceable Through Title V Permit
7. The unit shall be fired on LPG as backup fuel only during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. If the unit is fired on LPG as backup fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NOx at least once during that year using an APCO approved portable NOx analyzer. Monitoring for backup fuel NOx emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on backup fuel solely to perform monitoring. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
18. Fuel hhv for source test purposes shall be certified by a third party fuel supplier or determined using ASTM D 1826 or D1945 in conjunction with ASTM D 3588 for gaseous fuels or ASTM D 240 or D 2382 for liquid hydrocarbon fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

25. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

26. Permittee shall record the monthly fuel consumption. [District Rule 1070 and 2520, 9.3.2, and 40 CFR 60.48(c)(g)(2)] Federally Enforceable Through Title V Permit

27. Operator shall maintain copies of LPG fuel invoices. [District Rules 2520, 9.3.2 and 4320, 6.1.5] Federally Enforceable Through Title V Permit

28. Daily and annual records of backup LPG consumption consisting of the date the boiler operated on LPG and the amount of time the boiler was operated, in hours, on LPG shall be maintained. [District Rules 2201, 4305, 4306, and 4320, 6.1.1] Federally Enforceable Through Title V Permit

29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-628-5-8 **EXPIRATION DATE:** 11/30/2016

EQUIPMENT DESCRIPTION:
97 MMBTU/HR NEBRASKA MODEL NS-F-81 NATURAL GAS-FIRED BOILER (EAST), WITH LPG AS BACKUP FUEL, WITH AN ALZETA MODEL CSB-1210 ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas as the primary fuel and LPG as the backup fuel. [District Rules 2201 and 4320, 5.4.1.1] Federally Enforceable Through Title V Permit
4. The sulfur content of the LPG backup fuel shall not exceed 15 grain per 100 scf. [District Rules 2201 and 4320, 5.4.2] Federally Enforceable Through Title V Permit
5. When fired on natural gas, emissions rates from the unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0088 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Federally Enforceable Through Title V Permit
6. When fired on LPG as backup fuel, emissions rates from the unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0088 lb-NOx/MMBtu, 0.0044 lb-PM10/MMBtu, 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu, or 0.017 lb-SOx/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1 and 4320, 5.2] Federally Enforceable Through Title V Permit
7. The unit shall be fired on LPG as backup fuel only during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. If the unit is fired on LPG as backup fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NOx at least once during that year using an APCO approved portable NOx analyzer. Monitoring for backup fuel NOx emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on backup fuel solely to perform monitoring. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
18. Fuel hhv for source test purposes shall be certified by a third party fuel supplier or determined using ASTM D 1826 or D1945 in conjunction with ASTM D 3588 for gaseous fuels or ASTM D 240 or D 2382 for liquid hydrocarbon fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

25. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

26. Permittee shall record the monthly fuel consumption. [District Rule 1070 and 2520, 9.3.2, and 40 CFR 60.48(c)(g)(2)] Federally Enforceable Through Title V Permit

27. Operator shall maintain copies of LPG fuel invoices. [District Rules 2520, 9.3.2 and 4320, 6.1.5] Federally Enforceable Through Title V Permit

28. Daily and annual records of backup LPG consumption consisting of the date the boiler operated on LPG and the amount of time the boiler was operated, in hours, on LPG shall be maintained. [District Rules 2201, 4305, 4306, and 4320, 6.1.1] Federally Enforceable Through Title V Permit

29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-628-13-4 **EXPIRATION DATE:** 11/30/2016

EQUIPMENT DESCRIPTION:
43.4 MMBTU/HR NEBRASKA MODEL NS-C-42-ECON NATURAL GAS-FIRED BOILER, EQUIPPED WITH AN ALZETA ULTRA-LOW NOX BURNER WITH A VARIABLE FREQUENCY DRIVE FOR AIR INTAKE FAN MOTOR AND OXYGEN TRIM EQUIPMENT IN EXHAUST STACK

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-regulated natural gas as the primary fuel and LPG as the backup fuel. [District Rules 2201 and 4320, 5.4.1.1] Federally Enforceable Through Title V Permit
4. The sulfur content of the LPG backup fuel shall not exceed 15 grain per 100 scf. [District Rules 2201 and 4320, 5.4.2] Federally Enforceable Through Title V Permit
5. When fired on natural gas, emissions rates from the unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0088 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1, and 4320, 5.2] Federally Enforceable Through Title V Permit
6. When fired on LPG as backup fuel, emissions rates from the unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.0088 lb-NOx/MMBtu, 0.0044 lb-PM10/MMBtu, 200 ppmvd CO @ 3% O2 or 0.148 lb-CO/MMBtu, 0.0055 lb-VOC/MMBtu, or 0.017 lb-SOx/MMBtu. [District Rules 2201, 4305, 4306, 5.1.1 and 4320, 5.2] Federally Enforceable Through Title V Permit
7. The unit shall be fired on LPG as backup fuel only during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. If the unit is fired on LPG as backup fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NOx at least once during that year using an APCO approved portable NOx analyzer. Monitoring for backup fuel NOx emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on backup fuel solely to perform monitoring. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
11. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
18. Fuel hhv for source test purposes shall be certified by a third party fuel supplier or determined using ASTM D 1826 or D1945 in conjunction with ASTM D 3588 for gaseous fuels or ASTM D 240 or D 2382 for liquid hydrocarbon fuels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

24. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

25. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit

26. Permittee shall record the monthly fuel consumption. [District Rule 1070 and 2520, 9.3.2, and 40 CFR 60.48(c)(g)(2)] Federally Enforceable Through Title V Permit

27. Operator shall maintain copies of LPG fuel invoices. [District Rules 2520, 9.3.2 and 4320, 6.1.5] Federally Enforceable Through Title V Permit

28. Daily and annual records of backup LPG consumption consisting of the date the boiler operated on LPG and the amount of time the boiler was operated, in hours, on LPG shall be maintained. [District Rules 2201, 4305, 4306, and 4320, 6.1.1] Federally Enforceable Through Title V Permit

29. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, 6.1, and 4320, 6.1, and 40 CFR 60.48(c)(i)] Federally Enforceable Through Title V Permit

APPENDIX C

Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, QNEC can be summarized as shown in the following tables:

C-628-4-10 & 5-10: QNEC			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO_X	1,699.5	1,699.5	0
SO_X	605.5	674.25	-68.75
PM_{10}	1,614.5	1,614.5	0
CO	15,719.75	16,107.5	-387.75
VOC	1,168.25	1,168.25	0

C-628-13-7: QNEC			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO_X	770.75	770.75	0
SO_X	274.75	305.75	-31.0
PM_{10}	732.25	732.25	0
CO	7,130.75	7,306.5	-175.75
VOC	530.0	530.0	0

APPENDIX D

Emissions Profiles

Application Emissions

Permit #: C-628-4-10	**Last Updated**
Facility: CBUS OPS DBA MISSION BELL WINERY	12/08/2015 AIYABEIJ

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	6798.0	2422.0	6458.0	62879.0	4673.0
Daily Emis. Limit (lb/Day)	18.6	6.6	17.7	172.3	12.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	-68.0	0.0	-387.0	0.0
Q2:	0.0	-69.0	0.0	-388.0	0.0
Q3:	0.0	-69.0	0.0	-388.0	0.0
Q4:	0.0	-69.0	0.0	-388.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: C-628-5-10	**Last Updated**
Facility: CBUS OPS DBA MISSION BELL WINERY	12/08/2015 AIYABEIJ

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	6798.0	2422.0	6458.0	62879.0	4673.0
Daily Emis. Limit (lb/Day)	18.6	6.6	17.7	172.3	12.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	-68.0	0.0	-387.0	0.0
Q2:	0.0	-69.0	0.0	-388.0	0.0
Q3:	0.0	-69.0	0.0	-388.0	0.0
Q4:	0.0	-69.0	0.0	-388.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: C-628-13-7	**Last Updated**
Facility: CBUS OPS DBA MISSION BELL WINERY	12/08/2015 AIYABEIJ

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	3083.0	1099.0	2929.0	28523.0	2120.0
Daily Emis. Limit (lb/Day)	8.4	3.0	8.0	78.1	5.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	-31.0	0.0	-175.0	0.0
Q2:	0.0	-31.0	0.0	-176.0	0.0
Q3:	0.0	-31.0	0.0	-176.0	0.0
Q4:	0.0	-31.0	0.0	-176.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

APPENDIX E

Compliance Certification

San Joaquin Valley
Unified Air Pollution Control District

HEALTHY AIR LIVING

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[ ] SIGNIFICANT PERMIT MODIFICATION
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: CBUSO dba Mission Bell Winery	FACILITY ID: C -628
1. Type of Organization:[X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name:	
3. Agent to the Owner: Cindy Xiong	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **all** circles for confirmation):

(EM) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

(EM) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

(EM) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(EM) Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Erik Martella
Signature of Responsible Official

8/14/15
Date

Erik Martella
Name of Responsible Official (please print)

VP/GM Mission Bell Winery
Title of Responsible Official (please print)